

REMARKS:

In the Office Action the Examiner noted that claims 1-9, and 11-14 are pending in the application, and the Examiner rejected all claims. By this Amendment, claims 1, 3, 8, 9, and 11-14 have been amended. No new matter has been presented. Support for the amendment can be found at least at page 31, line 14 to page 34, line 21 and at page 36, line 25 to page 37, line 3 of the Specification as filed. The Examiner's rejections are traversed below, and reconsideration of all rejected claims is respectfully requested. Claim 10 remains cancelled

Thus, claims 1-9 and 11-14 are pending and under consideration. No new matter has been added. The Examiner's rejections are traversed below.

REJECTION UNDER 35 U.S.C. §103(a):

- A. In item 7 on page 3 of the Office Action the Examiner rejected claims 1, 3-7, 9, and 11-14 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,300,947 (Kanevsky) in view of instant specification.

The Applicants respectfully traverse the Examiner's rejections of these claims.

Claim 1, by way of example, recites "calculating a hash value for element names of text elements on a route from a root of a subtree to each of the text elements relatively with the same path, and generating a new text element by combining contents of the text elements relatively with the same path to preserve a text relationship between the contents if the text elements relatively with the same path have a same hash value". Claims 3, 9 and 11-14 have been amended to recite a similar feature.

Kanevsky fails to teach or suggest "calculating a hash value for element names of text elements on a route from a root of a subtree to each of the text elements relatively with the same path" and "generating a new text element by combining contents of the text elements relatively with the same path if the text elements have a same hash value", as taught by the claimed invention.

Instead, Kanevsky merely discusses combining objects that refer to the same or similar subjects at column 14, lines 58-62. Kanevsky is silent regarding calculating a hash value for element names of text elements.

The Examiner alleges that the instant specification teaches the expansion of an XML document in memory as a DOM tree structure. However, the discussion in the instant specification does not cure the deficiencies of Kanevsky regarding the independent claims of the present application. In particular, the discussion in the instant specification pointed out by the Examiner merely discusses existing problem(s) associated with increasing scale of DOM tree structures.

Further, even assuming *arguendo* that Kanevsky and instant specification did disclose the features discussed by the Examiner, the Applicants respectfully submit that there is no motivation to combine the cited references. The Examiner stated that the combination of the references would be obvious because would provide reliability and flexibility when splitting up the web page.

The record, however, fails to provide the required evidence of a motivation for a person of ordinary skill in the art to perform such modification. While Kanevsky may provide a reason for combining objects that refer to the same or similar subjects, absent hindsight, there is no motivation to incorporate the discussion in the instant application with that of Kanevsky, or vice versa.

MPEP §2143.01 states that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so. Therefore, as there is no requisite motivation to combine the references cited by the Examiner, the Applicants respectfully request the withdrawal of the Examiner's §103 rejections.

Claims depending directly or indirectly from the independent claims include all the features of the independent claims plus additional features. For at least the above-mentioned reasons, claims depending from the independent claims are patentably distinguishable over the cited references. The dependent claims are also independently patentable.

For example, the cited references do not teach or suggest that "said generating device generates the synthesized substructure if a combination of elements that successively exist side by side and have a same element name in two levels or more on the route to the certain level is not found", as recited in claim 4. Instead, the semantic interpreter module of Kanevsky merely separates objects on web pages that refer to different topics and combines objects that refer to the same or similar subjects (see, column 14, lines 58-62).

Therefore, withdrawal of the rejection is respectfully requested.

- B. In item 8 on page 8 of the Office Action the Examiner rejected claims 2 and 8 under 35 U.S.C. §103(a) as being unpatentable over Kanevsky in view of instant specification, and further in view of U.S. Patent No. 6,105,044 (DeRose).

The Applicants respectfully traverse the Examiner's rejections of these claims.

As mentioned above, the independent claims patentably distinguish over Kanevsky and instant specification. Claims 2 and 8 depend from independent claims 1 and 3, respectively, and include all the features of claims 1 and 3, respectively, plus additional features. DeRose also fails to teach or suggest at least the aforementioned feature of claims 1 and 3. Therefore, for at least the same reasons, claims 2 and 8 patentably distinguish over Kanevsky in view of the instant specification and DeRose.

Further, as DeRose merely discusses attaching the current name using a reserved delimiter which is not a character used in any of the descriptive markup tags of a document (see, col. 13, lines 34-37), DeRose does not cure the deficiencies of Kanevsky and instant specification regarding the independent claims of the present application.

The cited references, alone or in combination, teach or suggest "...deleting character strings at other positions in the contents of the elements in the certain record, restoring a record before being converted, which includes the search key, from the detected character string and the extracted character string, and outputting the restored record as a search result". See also claim 8 reciting similar features. Instead, DeRose merely discusses a summation of occurrences of a word in each element of a document at column 13, lines 34-35. DeRose is silent regarding deleting character strings in an element of a document.

It is respectfully submitted that DeRose does not teach or suggest these features of claims 2 and 8.

Therefore, withdrawal of the rejection is respectfully requested.

CONCLUSION:

There being no further outstanding objections or rejections, it is respectfully submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

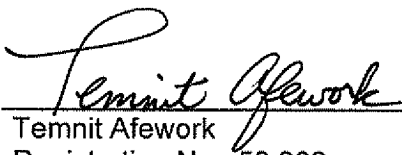
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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